

Exhibit 2

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----x
5 DONNA WOOD, et al.,
6 individually and on behalf of
7 all others similarly situated,

8 Plaintiffs,

9 -against-

10 Civil Action No.:
11 20 Civ. 2489
12 (LTS) (GWG)

13 MICHAEL BLOOMBERG 2020 INC.,
14 Defendant.

15 -----x
16 November 7, 2022
17 10:07 a.m.

18 VIDEOTAPED REMOTE DEPOSITION of JAMES KYLE
19 NEWMAN, held at the above date and time, before
20 Judith Castore, a Certified Livenote Reporter and
21 Notary Public of the State of New York.
22
23
24
25

1 NEWMAN

2 Brodie and the campaign were aware.

3 And I think it was looked at as sort of
4 an extenuating circumstance.

5 Q Other than the four
6 appointments that we just discussed,
7 did you ever take any other time off
8 during your employment with the
9 campaign?

10 A Not that I can recall.

11 Q Did you go to Oklahoma at any
12 point during your employment with the
13 campaign?

14 A I did actually, yes. That's
15 correct.

16 Q Why did you go to Oklahoma?

17 A I had to appear in Oklahoma
18 as part of a plea --

19 (Unreportable cross-talk.)

20 A -- all stemming from my car
21 accident in 2019.

22 Q Were you pleading guilty or
23 was someone else?

24 A I was, yes.

25 Q What did you plead guilty to

1 NEWMAN

2 in connection with that accident?

3 A So I ended up pleading to a
4 misdemeanor for possession of
5 controlled substances. There was a
6 small amount of marijuana in my car.

7 Q Had you consumed marijuana
8 prior to the accident?

9 A No, I had not.

10 Q Did the accident occur in
11 Oklahoma?

12 A It did.

13 Q Other than the charge that
14 you pled guilty to, were you charged
15 with any other criminal count?

16 A Not that I remember. I think
17 that there was a traffic violation
18 because I suppose under the letter of
19 the law, I was responsible for the
20 accident since it was my knee that
21 dislocated while I was driving. So
22 that may have been part of it.

23 But I know that the plea was
24 only in terms of the minor --
25 misdemeanor possession.

1 NEWMAN

2 Q And then if you look to the
3 next page, page 4, which is
4 Bates-stamped P36, it looks like there
5 is something missing in this
6 screenshot?

7 A I'm sorry, I don't see what
8 you mean.

9 Q Do you see the blue at the
10 bottom of page 3, P50?

11 A I do.

12 Q Okay. Do you know what that
13 message says?

14 A I do not. No, I do not. I
15 assumed it would be "provided no
16 information about" -- wherever it picks
17 up on the next one, but I'm not
18 certain.

19 Q Does it appear to you that
20 between page 3 and page 4 that there
21 are text messages that are missing in
22 this communication?

23 MS. COLE-CHU: Objection.

24 A I -- honestly, I cannot say.
25 This was two and a half years ago. I